in light that we have a rather ambitious schedule today, I'll hold my remarks to the witnesses.

CHAIRMAN CONWAY: Dr. Mansfield?

DR. MANSFIELD: As will I.

CHAIRMAN CONWAY: Dr. Matthews?

DR. MATTHEWS: Just quickly, I want to thank the presenters for taking the time to come here, and just to put it in context that my real issue in this is the age-old problem of balancing productivity and safety. And particularly in the world of accelerated clean-up, I think that is the hot issue, so I'll be looking for that in your testimony. Thank you.

CHAIRMAN CONWAY: And I might say that for each witness that appears before us this morning, we have an autobiography which we will submit, put in the record, preceding each of your testimonies, and with that, I'll turn to Mr. Jeffrey Allison, the Manager of Savannah River Operations Office for the Department of Energy. Mr. Allison.

MR. ALLISON: Good morning, Mr. Chairman and members of the Board. I'm Jeffrey Allison, the Manager of the Savannah River Operations Office, and I appreciate the opportunity to talk to you today concerning safety oversight at the Savannah River...
Site. There is no more important subject to me than the subject of safety. While I believe the Savannah River Site has a sound and mature safety program, with an excellent safety record, I also know that continuous improvement is necessary to maintain or improve this performance. The safety of the federal and contractor workforce, the public, and the environment receive daily attention from me and my staff.

Today I will discuss how I ensure policies and procedures are in place to safely execute the work process at the Savannah River Site.

May I have the first slide, please? Next slide. I will discuss the following topics during the course of my talk. We'll talk about how I establish expectations, how I organize and staff for success from the oversight standpoint, how I manage the contract, my personal involvement in operations and safety oversight, and how the Savannah River Operations Office reviewed and took lessons from the NASA [National Aeronautics and Space Administration] Columbia accident, then I'll conclude with a few remarks.

This slide details how the Savannah River Operations Office receives policy and direction from
Headquarters, and formulates that into procedures to conduct its oversight. DOE Policy 450.5 [Line Environment, Safety, and Health Oversight] gives Headquarters expectations for oversight. A key portion of the policy reads, "DOE Line Managers must acquire and maintain sufficient knowledge of program activities in order to make informed decisions on safety resources of their activities."

A robust contractor self-assessment program is one of the key elements of line ES&H [Environmental Safety and Health] oversight processes. The DOE field elements oversight function maintains operational awareness, and that's very key, of contractor work activities; it evaluates contractor self-assessment results using operational awareness, and conducts assessments when required, for example, Operational Readiness Reviews [ORR], when need is indicated by operational awareness activities or when merited by the results of the evaluation of contractor self-assessments.

Another key portion of this is also DOE Policy 411.1 [Safety Management Functions, Responsibilities, and Authorities], which establishes the ultimate responsibility and accountability for ensuring adequate protection of the operation of DOE
facilities, which rests with DOE line management. DOE fulfills this role where contractors are employed by establishing expectations in contractor requirements, overseeing compliance, and managing contracts. All of these, of course, flow into the direction that I have.

I have a Functions, Responsibilities, and Authorities Procedure which I call FRAP [Functions Responsibilities and Authorities Policy], which provides the roles of responsibilities, accountabilities and authorities for, among other things, safety and operational oversight, and that's a key aspect of how I provide direction to my direct reports and also my workforce on how they need to provide oversight of the contractor. A key aspect of that is also a senior management team, called the Executive Technical Management Board, and this is my senior management responsible for line operations and safety. We meet periodically to discuss areas of cross-cutting interests to the site, share lessons learned, and to make policy decisions that need to be made in the areas where policy and direction may not be as clear as it should be.

I also have an SRS [Savannah River Site] workplace safety, health, and security policy, and
this provide workers' safety, rights, and responsibilities. It's a document that's signed off by all the DOE and contractor counterparts at the Site, and so we have a shared understanding as a senior management council that these are the expectations that the workers need to do to operate safely, as well as the responsibilities and rights that they have as employees.

Finally, the Westinghouse contract, and part of that is the oversight plan that we put together, which we call the Performance Evaluation and Measurement Plan. This document provides direction to my staff as well as an understanding by the contractor of the activities that we're going to oversee in order to safely conduct their activities in the contract.

I also wanted to talk a little bit about at this point DOE Policy 226.1 [DOE Oversight Policy]. I have reviewed the DOE 226.1 and provided comments back to Headquarters that I believe would clarify the intent of that policy. The proposed policy maintains an emphasis on reliance on the contractor's feedback and improvement program. Based on a review of the proposed policy, and in consideration of the current programs previously
mentioned, I would not expect that significant changes would be necessary to implement the policy.

Now I want to talk a little bit about how I organize and staff for success. Oversight at the Savannah River Operations Office is really conducted at three levels. I've got my Facility Representatives that really are employees that have broad-based duties that provide observation of day-to-day operation and safety of the facilities, and they're really my eyes and ears out in the facility, and they're a very important aspect of my oversight process. They are kind of like my first line of defense. They're the ones who are out there on a day-to-day basis that are looking at things, and they're smart, they're not necessarily experts in every area, but they're smart, and they understand when there's issues that they need to bring to the tech specialist. Specialists are folks that look at criticality safety, nuclear safety, RADCON [Radialogical Control], industrial safety, all the various subject matter experts [SME].

The way I've organized this, my line organizations have all the technical resources they need to conduct their duties. I also have an ES&H [Environmental Safety and Health] organization that
provides cross-cutting, site-wide reviews of safety and health programs and operations. They look for trends, they share lessons learned, they look across the various line organizations. They also provide an independent assessment aspect for me, so they look at the line organizations. Their role is to really help the line organization implement their safety and operations oversight, but if they also feel that the line organizations are not adequately discharging those duties, they have, through the fact that they report to me, also an avenue to report any concerns to me so that I can resolve those issues. So it provides a check and balance for me in my oversight.

From the standpoint of staffing, my Facility Reps, I've got 29 Facility Reps currently, and they're all fully qualified. I have a total of 206 positions that fall in the technical qualification programs, 152 of those positions are fully qualified. In a recent reorganization back in June, I moved some folks around to give them some new responsibilities and duties, and so of the 54 people that are currently not qualified in the technical qualification program, 23 of those were previously qualified, so I do have a fairly sound and technical
workforce.

Now I want to talk about managing the contract. This slide, under operational oversight, provides many of the aspects and things that we do to oversee what the contractor does. Now the most important thing, I believe, is maintaining operational awareness. Just getting out in the facilities, understanding what's going on, overseeing the operations, and doing observations, and from those observations, management walk-throughs, management presence is also very important, not only the technical folks. We go out and we develop formal technical assessments. We also look at performance indicators. Those are very critical in understanding trends.

But probably the most important thing is looking at day-to-day operational activities, whether it's occurrence reports, or just field observations, looking at that information, analyzing it, understanding what it means and looking for trends. That's probably the most important thing that we can do, and then, of course, providing that feedback to the contractor is very important because the whole idea of oversight is to improve performance, and so providing feedback and my expectations for my senior
line management is that they are providing feedback
to the contractor on a routine basis, so when I send
the contractor a letter there should be no surprises.

I also believe that something that's very
important is my personal involvement in safety and
understanding what's going on out in the field and
the operations. One of the things that I have on my
staff of direct report to me and the manager of the
office, is I have a technical assistant who is
assigned to my staff to ensure I am kept fully aware
of operational issues in all facilities and work
activities, and this person is a former Senior
Facility Rep, and that person provides a lot of
directly insight to me. This person also attends all
the daily conference calls of operational activities
so they maintain direct awareness. We review all the
operational occurrences from the prior night, and
every morning that person and I sit down and discuss
those activities. We do a quick analysis to
understand if there is any trends that we need to
push back from the line organizations to make sure
that they are fully going out and looking at these
activities and taking the appropriate action steps,
and whether or not there is a need to provide
feedback to the contractor.

I also meet weekly with my senior staff, senior management staff, and the purpose of these meetings is to really share lessons learned, and discuss operational and safety issues. I spend a lot of time personally out in the field, getting out there with my Facility Reps, understanding issues, and one of the things that I do to make sure that I'm getting clear and unfiltered information from my line managers is, I'll go out and talk with Facility Reps, and then I'll wait and see what the message I get back from the line manager on issues that they have, and that provides a good way for me to correlate whether or not I'm getting information directly, or whether it's getting filtered through the line, or if I'm not even receiving information.

I think one of the things that I try to do is have a personal ownership and commitment for safety, and I've provided those expectations through performance plans and clear communication to my senior management team.

I want to talk a little bit about what we did at the Savannah River Operations Office with the Columbia Accident Investigation Report. The first thing I did was I sent that out to my senior
management team, and asked them to read and review that, and also share that with their senior technical and Facility Reps. We sat down for a couple of hours as a senior management team and analyzed that report, and one of the things that we focused in on were some of the behaviors and organizational aspects of that and their applicability to Savannah River. Some of the things that we found that were very important that came out of that report were clearly communicating safety expectations, and so we tried to maintain that as a focus area, and I've continued to do that through all-hands meetings and talks with my staff. Any time I get a chance to talk about safety from my expectations and how that relates to accelerating work activities and why safety is the most important thing that we do from the standpoint of accelerating work, I take that opportunity.

We also wanted to make sure that there were clear lines of communication. When safety issues are raised, they need to be resolved either by making some correcting actions, or getting additional information and recognizing that it may not be as significant an issue as we thought. We made sure we got that message again, reinforced that to the workforce so they knew that if you have a safety
issue, it's going to get resolved one way or the other. There will be no safety issues that will not get resolved.

We've continued to reinforce that and continued to talk about that through our organization and made sure people understand primarily the message of accelerated clean-up and how that doesn't diverge from having safe operations.

Let me just conclude, and then I'll be glad to take any questions from you. I believe at the Savannah River Site, we've got a sound and mature safety program with an excellent safety record. I know that constant vigilance is required to maintain and improve this performance. Our discipline framework for able and due Headquarters direction for oversight is accomplished through the commitment of senior managers and their technical staff who are fully engaged in the operational oversight of their facilities. I believe I have demonstrated commitment to safety as an individual and manager, and as such, I have created a culture that fosters open communication, values safety, and strives for continued improvement. I appreciate the opportunity to submit testimony and will be glad to answer any questions.
CHAIRMAN CONWAY: Thank you, Dr. Eggenberger?

VICE CHAIRMAN EGGENBERGER: You mentioned that the oversight policy that's being put together by Headquarters, or has been put together by Headquarters, that you have provided comments on the policy and one of the conclusions that you drew was that there would be no changes required on your part to implement this policy. Is that -- you nod, "Right." Okay.

MR. ALLISON: That's correct.

VICE CHAIRMAN EGGENBERGER: I'm not sure what that policy is. If there is - if no change is required, is this a new policy or don't we have orders that define the policy fairly well, or can you maybe give your view on that briefly?

MR. ALLISON: I looked at the policy and also kind of did a coarse correlation with DOE Policy 450.5 which provides line ES&H oversight. From my perspective, I believe that the new Policy 226.1 does a good job of picking up some other areas like cybersecurity that weren't covered in DOE policy 450.5, so I believe it's more inclusive. From the standpoint of the aspects of the policy that are implemented, I believe that, you know, there's not a lot of --
basically the message is very similar to the current policy. I didn't see where I was going to -- I would relax my oversight, for example, in areas. It talks about a graded approach, the prior policy talked about a graded approach. It talks about reliance on the contractor self-assessment, this policy does too.

My feeling is that to effectively oversee the contractor, or manage the contract, there is a certain level of oversight that you need to provide. You need to maintain the safety envelope and make sure that the contractor is doing that. As the federal government, I think I have a role in doing that in overseeing the contract, so I didn't see from the standpoint of, you know, looking at that and having some of my senior folks look at it, that I was going to have to make significant changes in my oversight.

VICE CHAIRMAN EGGENBERGER: Would you agree with me that contractor self-assessment is part of the contractor's job and that this is nothing new? That the contractor should always be self-assessing? Do you want to comment on that?

MR. ALLISON: I agree with you, A.J. In fact, the contractor in Bobble [as heard] talked to that as a very strong self-assessment program, you
know, from the line self-assessment as well as the independent assessment, and so I believe that the contractor needs to do that. We have, in fact, taken advantage of that in our oversight. We address and assess the contractor's self-assessment program, look at how rigorous a job they're doing, and clearly in areas where they're not finding issues, where they've done a fairly thorough job, we use that in our assessment program and make sure -- we may do a spot check in those areas. Areas where they're finding issues, we may look at a little bit deeper. So we do use that, and they do have -- the contractor does have a fairly strong self-assessment program.

VICE CHAIRMAN EGGENBERGER: You're saying it two ways here. Earlier you said that it was important for you, as the government, to examine what the contractor is doing period. That's a summary of what you said, I think. Now you're telling me well, maybe you'll look at some of the stuff that the contractor is doing, but you may rely on his self-assessment and not look at everything. Is that correct?

MR. ALLISON: Well, okay. Let me clarify that.

VICE CHAIRMAN EGGENBERGER: Yes.
MR. ALLISON: I do believe that the government has an obligation to understand what's going on, that's the operational awareness, and we do have an obligation to look periodically at certain areas to basically validate the contractor self-assessment program. I don't have the resources, and I don't think I should have the resources, to look at everything in 100% standpoint as far as everything that the contractor does, but I need to have people that are smart, that are looking at trends, so we can go out and do a smart assessment program and make sure that we're looking at the areas that are most critical.

Certain areas, clearly an Operational Readiness Review, you know, if the order dictates that we need to do that, we're going to do that, regardless of how good of a ready assessment the contractor has done. So the point I was trying to make is that no, we're not going to 100% review, but we're going to do a smart sampling. A part of that sampling is based on how well of a self-assessment the contractor is doing.

VICE CHAIRMAN EGGENBERGER: Thank you.

DR. MANSFIELD: Just one or two questions. On your corrective action programs, I'd
like to use an example, one that's probably in process right now. The recent occurrence of disabling of both lines of ventilation in the FB Line during maintenance, clearly some change, some maintenance procedure would have prevented that. The question, and maybe it's a question for Mr. Pedde, is are procedures going to be changed, and how will you track that? How will the Savannah River Office track that, and who at Headquarters tracks you tracking that?

MR. ALLISON: Okay. Well, as far as whether or not we're going to track that, yeah, my Facility Reps will be watching, you know, what changes are made and then, you know, clearly they'll report that back through their line management and to me. As far as who is going to be watching what I'm doing, Paul Golan, whom I report to, he and I stay in very close contact on operational issues, and so he will be aware of what's going on, and I'll make sure he understands the corrective measures that have been taken.

DR. MANSFIELD: Does this -- was this set of occurrences more important than most? It seems to me that the failure of two safety systems, two redundant safety systems, should take more than an
ordinary amount of attention.

MR. ALLISON: Yes. Clearly anytime a safety system fails, that is something of significant concern to me and to my staff, and so -- and I'll let Bob speak from his perspective, but clearly that was a concern, and we are looking very closely at why that happened, how that happened, and what the corrective measures might be.

DR. MANSFIELD: Okay, and does Mr. Golan at Headquarters keep close technical contact with this?

MR. ALLISON: He and I talk, if not daily, several times a week. He also has access to any occurrences that happen, and we talk frequently about issues that are of an operational nature.

DR. MANSFIELD: That's all.

CHAIRMAN CONWAY: Dr. Matthews?

DR. MATTHEWS: Before this meeting, I kind of looked at Undersecretary Card's testimony, and you did too in the previous meeting, and he said something here I thought was important. He said, "We're going to put pressure on the systems to deliver more for less, and as a result of that accelerated work," then he said, "We have to think through how this is going to induce new hazards into
1 the system." I think that's an important statement,
2 so I was curious about what new hazards does
3 accelerated clean-up induce in the systems, have you
4 identified those, and how will you predict those as
5 the contractor goes through his job?
6 MR. ALLISON: I think with accelerated
7 clean-up, just as before, it's very important to have
8 a good understanding of what your scope of work is
9 and to clearly analyze the hazards. I mean, I think
10 ISM [Integrated Safety Management] has become, if
11 anything, more important in how we're doing work, and
12 to have deliberate, very good understanding of that
13 skillful work, what the boundaries are, it's very
14 important right now, and so that's really what the
15 focus has been on, you know, having that good up-
16 front planning, and making sure you have the right
17 controls in place, whether it's protective clothing
18 or engineering controls. That has become more and
19 more important, and so that's really been an area of
20 focus and an area of concern.
21 DR. MATTHEWS: Okay, but you didn't tell
22 me any new hazards you may have identified. Let me
23 tell you one that I would identify, and then I'll let
24 you respond to that, and because of this sort of
25 managing the contract, not the contractor concept,
and pretty significant awards for meeting milestones
and deliverables, and accelerated clean-up (And by
the way, I congratulate the contractors for making
good progress on your site.) I'm not against
accelerated clean-up as such, I'm just worried about
the safety of locations [activities]. But I would
say a new hazard would be that there may be a
motivation by some to cut corners, and therefore,
take a little more risk in order to get done faster.

Do you see that as a hazard? Is that the type of
thing you think about?

MR. ALLISON: Well clearly, that's an
issue of concern, and that's got to be part of the
message that we communicate as a management team
that, you know, safety will not be relaxed just
because we're accelerating clean-up. Clearly you've
got to take the same rigorous approach to executing
work as you did before. There is no relaxation of
safety requirements or procedures, but clearly, you
know, as over the years I think we've come to the
conclusion that we probably have layered on
additional requirements above and beyond what needs
to be done to get work done, and so what we're trying
to do, and the way I look at is, de-layer or peel
back some of those requirements that don't
necessarily add value from the standpoint of getting work done or safety, but were just additional checks and balances that we put in because of prior events.

So we're trying to delayer those work activities and procedures clearly maintaining a focus on safety, but also trying to balance that with getting work done and reducing risk.

DR. MATTHEWS: Can you give me an example of a delayered requirement that would accelerate work?

MR. ALLISON: Well, not necessarily a specific example, but I know in some of our job planning and job hazards analysis, you know, we've over the years just added additional requirements on top of requirements, and in some of our procedures, as you go through those and look at them, they've just become too, you know, jobs that should take four hours take eight hours. I think I can provide you with an example. I'll submit that for the record separately.

DR. MATTHEWS: Yeah, I'll give you an example I would use, is you know, a stack of paper that high with hazards assessment doesn't really help the operator minimize hazards. Is that the kind of
thing you're --

MR. ALLISON: Yeah, that's the kind of thing, but I think I can provide you with some specific examples of -- I will do that.

DR. MATTHEWS: Good.

CHAIRMAN CONWAY: Let me follow up if I may. Are you finished? Let me follow up on that now. Have you made during the past year any modifications of your engineering manuals of practice? Isn't that some of the changes you've made?

MR. ALLISON: Yes.

CHAIRMAN CONWAY: Okay, and how they use these manuals? Are these specific changes you're making?

MR. ALLISON: Yeah, well, the contractor is making those.

CHAIRMAN CONWAY: How did you make the decisions in what you're going to change in your manuals of practice? I mean, these are specific changes you're making, as I've been told.

MR. ALLISON: Yeah.

CHAIRMAN CONWAY: Well, this is in answer to his question, your manuals, engineering manuals of practice are pretty fundamental for your people. Now
MR. ALLISON: Yes.

CHAIRMAN CONWAY: Okay, well, that would be one of the things I think you could have explained to Dr. Matthews. Now that's pretty significant. Now is this because of the new policies that are coming out from Headquarters?

MR. ALLISON: No. This is --

CHAIRMAN CONWAY: This is something you would have done anyway?

MR. ALLISON: Yeah.

CHAIRMAN CONWAY: So you had these in -- this is not because of the new policies coming out of Headquarters?

MR. ALLISON: No, they're not related to that.

CHAIRMAN CONWAY: So these are something you're doing on your own initiative?

MR. ALLISON: Yes, as we're trying to figure out, you know, basically, like I said, de-layer some of these procedures and policies that we've added requirements that are above and beyond the standards, we're trying --

CHAIRMAN CONWAY: But why did you have some of these in the past if they weren't really
necessary? You've been here for quite awhile. I suspect, but I'm hearing you say no, that this is in furtherance of or in following on the new policies that are coming out of Washington.

MR. ALLISON: No. I mean, what we're trying -- well, in an effort to try to accelerate the work, we're looking at ways in which we can basically de-layer and make -- allow the worker to do the work safety, but without having all kinds of excess requirements layered on top of him.

CHAIRMAN CONWAY: So these were decisions you made on your own down at --

MR. ALLISON: Yeah.

CHAIRMAN CONWAY: -- in furtherance of this.

MR. ALLISON: Yeah. As we've looked at policies and procedures, looked at ways in which we can accelerate the work, we've also taken advantage of things that have been done at other sites, lessons that they've learned --

CHAIRMAN CONWAY: Okay. How do you disseminate these new approaches now to your workers out in the field? How do you -- now you're making changes, you're no longer following all these procedures that were in the manuals, now how do you
get that down to your working people?

MR. ALLISON: Well clearly we have to communicate as management and let them know, you know, why this change is being made --

CHAIRMAN CONWAY: Are you doing this in writing or is this all verbal?

MR. ALLISON: I think most of it is -- I'll have to let Bob talk to that.

CHAIRMAN CONWAY: All right.

MR. ALLISON: I know I've had a lot of communication with my workforce in accelerated clean-up so that's just --

CHAIRMAN CONWAY: Okay. So these changes are being made because of the -- from the contractors' point of view?

MR. ALLISON: Well, the contractors proposed them clearly as --

CHAIRMAN CONWAY: So it's a contractor proposal. It's coming out of the contractor to you, and you're approving or disapproving some of them, I presume.

MR. ALLISON: Yeah.

CHAIRMAN CONWAY: Okay, so then I should turn to Bob Pedde and let him explain some of these changes you're making or proposing to the government.